



August 22, 2016

**VIA ECFS**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**Re: Notice of Oral *Ex Parte* - Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, GN Docket No. 14-177; IB Docket Nos. 15-256 & 97-95; RM-11664; WT Docket No. 10-112 (“Report and Order”)**

Dear Ms. Dortch:

On August 18th, 2016, representatives of the Satellite Industry Association (“SIA”)<sup>1</sup> met with members of the International Bureau to discuss the above referenced

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<sup>1</sup> SIA is a U.S.-based trade association providing representation of the leading satellite operators, service providers, manufacturers, launch services providers, and ground equipment suppliers. Since its creation twenty years ago, SIA has advocated on behalf of the U.S. satellite industry on policy, regulatory, and legislative issues affecting the satellite business. SIA Executive Members include: The Boeing Company; DIRECTV; EchoStar Corporation; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; Ligado Networks; Lockheed Martin Corporation; Northrop Grumman Corporation; OneWeb; SES Americom, Inc.; Space Exploration Technologies Corp.; SSL; and ViaSat, Inc. SIA Associate Members include: ABS US Corp.; Artel, LLC; COMSAT Inc.; DigitalGlobe Inc.; DRS Technologies, Inc.; Eutelsat America Corp.; Global Eagle Entertainment; Glowlink Communications Technology, Inc.; Hughes; iDirect Government Technologies; Inmarsat, Inc.; Kymeta Corporation; O3b Limited; Panasonic Avionics Corporation; Planet Labs Inc.; TeleCommunication Systems, Inc.; Telesat Canada; TrustComm, Inc.; Ultisat, Inc.; and XTAR, LLC.

proceeding.<sup>2</sup>

SIA provided inputs on issues that the FCC should consider addressing in the upcoming Public Notice with respect to methodologies to calculate the 0.1 percent population limit and further details regarding earth station interference zone calculations.<sup>3</sup> Specifically, SIA discussed the following topics: the need for reference population data, identification of an appropriate propagation model, ensuring the availability of information on UMFU deployments for coordination purposes, and the method for calculating aggregate population coverage in a UMFU license area.

With regard to the Report and Order, SIA discussed the FCC's plans for addressing any future interference into protected satellite operations that may arise from UMFU operations.

Attending on behalf of SIA in were: Tom Stroup (SIA), Charity Weeden (SIA), Giselle Creaser (Inmarsat), Suzanne Malloy (O3b), Jennifer Manner (EchoStar), Bruce Olcott (Jones Day for Boeing), Alexander Gerdenitsch (EchoStar), Tom Tycz (Goldberg, Godles, Wiener, & Wright LLP for Iridium), Petra Vorwig (SES), Elizabeth Park (Latham & Watkins LLP for ViaSat), Philippe Secher (SES), and Whitney Lohmeyer (OneWeb). Participating via phone were: Susan Crandall (Intelsat), Scott Kotler (Lockheed Martin), Jack Wengrniuk (DIRECTV), Daryl Hunter (ViaSat), Chris Murphy (ViaSat), Joe Godles (Goldberg, Godles, Wiener, & Wright LLP for Iridium), Marc Dupuis (OneWeb), Ethan Lucarelli (Inmarsat), Zachary Rosenbaum (O3b), and John Janka (Latham & Watkins LLP for ViaSat).

Attending on behalf of the FCC were: Mindel De La Torre, Jose Albuquerque, Thomas Sullivan, Kerry Murray, Paul Blais, Chip Fleming, Troy Tanner, and Nese Guendelsberger.

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<sup>2</sup> Available at: [http://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2016/db0728/FCC-16-89A1.pdf](http://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0728/FCC-16-89A1.pdf).

<sup>3</sup> Report and Order and Further Notice of Proposed Rulemaking, GN Docket 14-177, IB Docket 15-256, RM-11664, WT Docket 10-112, IB Docket 97-95. Footnote 120: The International Bureau will issue a public notice seeking comment on the appropriate methodology to calculate the 0.1 percent population limit and further details regarding earth station interference zone calculation (including propagation models, e.g. free space versus probabilistic), and will also seek comment on best practices for earth station siting to minimize the impact on UMFU services, colocation of earth stations, and accommodating multiple earth station interference zones without exceeding 0.1 percent of population in a given county.

Respectfully submitted,

**SATELLITE INDUSTRY ASSOCIATION**

By: /s/ Tom Stroup

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cc:

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